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11 *Attorneys for the State of California et al.*

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13 **UNITED STATES DISTRICT COURT**
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15 **NORTHERN DISTRICT OF CALIFORNIA**
16
17 **SAN FRANCISCO DIVISION**

18 IN RE: CATHODE RAY TUBE (CRT)
19 ANTITRUST LITIGATION,

Master File No. 3:07-cv-05944-SC

MDL No. 1917

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22 This Document Relates To:
23
24 ALL ACTIONS

**DECLARATION OF EMILIO E.
VARANINI IN SUPPORT OF THE
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL**

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28 1. I am a Deputy Attorney General with the California Attorney General's Office and
lead counsel for the California Attorney General in the state court case of *State of California et al.*
v. Samsung SDI, Co., Ltd., Case No. 11-51584 (California Superior Court, San Francisco). This
case has been coordinated with this Court's MDL No. 1917 for purposes of fact and expert
discovery as well as mediation and settlement. I am admitted to this Court and could, if called as
a witness, testify competently to the matters set forth herein. I make this declaration under
penalty of perjury under the laws of the United States and the State of California.

1 2. Portions of the Administrative Motion for Order Issuing Request for Deposition of
2 Leo Mink and of the Declaration of Emilio E. Varanini in Support of that motion, as well the
3 entirety of two exhibits attached to that Declaration and the Letter of Request itself (including the
4 Dutch translation of that latter) refer to the following information: (1) confidential documents
5 and interrogatory responses produced pursuant to the Protective Order applicable in these
6 proceedings and (2) confidential information received from Defendant Philips pursuant to a
7 settlement agreement that it has with the Attorney General, including the personal address of a
8 witness the Attorney General seeks to depose.

9 3. Specifically, pages 5:25-28, 6:1-2, and 6: 6-13 of the Administrative Motion for
10 Order Issuing Request for Deposition of Leo Mink, pages 2:22-26, 3:1-2, 3:6-8, and 3:10-11 of
11 the Declaration of Emilio E. Varanini in support of that motion, Exhibits 2 and 3 of that
12 declaration, and the Letter of Request, all contain this confidential information. This confidential
13 information has been submitted in support of a non-dispositive motion.

14 3. The references to, and attachment of, the contention interrogatories and the
15 document from Defendant Philips, involve documents provided in the course of discovery in this
16 case and have been designated as “Confidential” or “Highly Confidential” pursuant to the
17 Protective Order applicable in this case. The references to confidential information provided to
18 the Attorney General by Defendant Philips, such as the personal address of the witness the
19 Attorney General seeks to depose, concern information provided to the Attorney General pursuant
20 to the settlement agreement entered into between those two parties.

21 4. While only portions of the motion and declaration referenced above were lodged
22 under seal, the Attorney General also has lodged under seal the entirety of Exhibits 2 and 3 of that
23 declaration as well as the entirety of the Letter of Request and its Dutch translation. The Attorney
24 General believes that it is not practical for only portions of these documents to be filed under seal
25 given the extensive reference to confidential information throughout the entirety of these
26 documents.

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1 Dated: January 16, 2014

Respectfully submitted,

2 KAMALA D. HARRIS
3 Attorney General of California

4 */s/ Emilio Varanini*
5 EMILIO VARANINI
6 Deputy Attorney General
7 *Attorneys for the State of California et al.*

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